

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE: : Case No. 22-10056-TPA  
: (Chapter 13)  
WAYNE V. LEWIS : Judge Thomas P. Agresti  
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Debtor. :  
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WAYNE V. LEWIS : Document No.  
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:  
Movant, : Related to Document No.  
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:  
vs. :  
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WILMINGTON SAVINGS FUND :  
SOCIETY, FSB :  
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:  
Respondent. :  
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RESPONSE OF THE DEBTOR, WAYNE V. LEWIS, TO THE COURT ORDER  
DATED AUGUST 12, 2022 ON THE OBJECTION TO THE ALLOWANCE  
OF THE CLAIM OF WILMINGTON SAVINGS FUND SOCIETY, FSB  
PURSUANT TO 11 U.S.C. § 502 AND BANKRUPTCY RULE 3007

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Now comes the Debtor, WAYNE V. LEWIS, by and through counsel,  
MICHAEL J. GRAML, ESQ., and respectfully represents as follows:

1. The United States Bankruptcy Court issued an Order dated August 12, 2022 in regard to the pending matter [Doc. Nos. 25, 26, 28, 30, 34, 36 and 37] where the Bankruptcy Court directed Counsel for Debtor to review the *Certification of Counsel Regarding Pre-Petition Attorney's Fees and Costs* ("Certification") and file any objection(s) thereto.

2. Counsel for Debtor previously served Interrogatories over additional concerns over the pre-petition arrearage. Those answers are due in approximately one (1) week.

3. Counsel for Debtor would request an extension of time for discovery to be completed for the receipt of the additional documentation and/or interrogatories from the mortgage company.

WHEREFORE, the Debtor prays for an extension of time to complete the limited discovery that has been initiated and GRANTING the Debtor such other and further relief as may be just and proper.

Respectfully submitted,

Dated: August 18, 2022

/s/ MICHAEL J. GRAML  
MICHAEL J. GRAML, ESQ.  
Attorney for Debtor/Movant  
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Erie, PA 16501  
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CERTIFICATE OF SERVICE OF RESPONSE OF THE DEBTOR, WAYNE V. LEWIS,  
TO THE COURT ORDER DATED AUGUST 12, 2022 ON THE OBJECTION TO  
TO THE ALLOWANCE OF THE CLAIM OF  
WILMINGTON SAVINGS FUND SOCIETY, FSB  
PURSUANT TO 11 U.S.C. § 502 AND BANKRUPTCY RULE 3007

I certify under penalty of perjury that I served the above captioned pleading, proposed Order of Court and Notice of Hearing on the parties at the addresses specified below or on the attached list on **August 18, 2022**.

The type(s) of service made on the parties (first class mail, electronic notification, hand delivery, or another type of service) was: **Electronic Notification and First Class Mail.**

ELECTRONIC NOTIFICATION:

Ronda J. Winnecour, Esq.  
Office of the Chapter 13 Trustee  
USX Tower, Suite 3250  
600 Grant Street  
Pittsburgh, PA 15219  
[cmeccf@chapter13trusteewdpa.com](mailto:cmeccf@chapter13trusteewdpa.com)

SERVICE BY FIRST CLASS MAIL:

Michael Clark, Esq.  
Richard M. Squire & Assoc., LLC  
115 West Avenue, Suite 104  
Jenkintown, PA 19046  
  
Statebridge Company, LLC  
6061 S. Willow Drive  
Greenwood Village, CO 80111

**ELECTRONIC NOTIFICATION:**

Office of the U.S. Trustee  
Liberty Center, Suite 970  
1001 Liberty Avenue  
Pittsburgh, PA 15219  
[ustpregion03.pi.ecf@usdoj.gov](mailto:ustpregion03.pi.ecf@usdoj.gov)

**SERVICE BY FIRST CLASS MAIL:**

Wilmington Savings Fund  
Society, FSB  
Attn: Rodger Levenson  
Chairman, President and Chief Executive Officer  
500 Delaware Avenue  
Wilmington, DE 19801

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, the names and addresses of parties served by electronic notice will be listed under the heading "Service by Electronic Notification and those served by mail will be listed under the heading Service by First Class Mail.

**EXECUTED ON:**

August 18, 2022

/s/ MICHAEL J. GRAML

MICHAEL J. GRAML, ESQ.  
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